

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10384-PBS
)	
DANIEL KAMEN,)	
Defendant.)	

ASSENTED-TO MOTION FOR EXCLUDABLE TIME

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant U.S. Attorney Paul R. Moore, and the defendant, DANIEL KAMEN, by and through his counsel, Peter Elikann, Esq., jointly move pursuant to United States Code §3161(h)(8)(A) that the period from October 25, 2005, the date after which a Further Status Conference was held in this matter, up to and including December 19, 2005, the date on which a Final Status Conference will be held, be excluded from computation under the Speedy Trial Act of the time within this case must be tried. As reasons therefore, the parties represent that this brief continuance is necessary so that the parties can continue to examine the evidence in this matter and explore possible resolution of the matter without going to trial. Therefore, it is in the interests of justice that the current motion be allowed.

WHEREFORE, the parties respectfully request that the Court enter a written order of excludable delay covering the period from October 25, 2005, through December 19, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

DANIEL KAMEN
Defendant

By: /s/ Charles Rankin
Charles Rankin, Esq.
Peter Elikann, Esq.
Counsel for DANIEL KAMEN

DATE: October 24, 2005